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May 3, 2011

Via ECF Filing

The Honorable Stanley R. Chesler  
Frank R. Lautenberg U.S. Post Office & U.S. Courthouse  
Federal Square  
P.O. Box 999  
Newark, NJ 07101

RE: Sholanda McCall v. Toyota Motor Corporation, et al.  
*United States District Court – District of New Jersey – Civil Action*  
Docket No.: 11-cv-02438  
Our File No.: 292107-00143

Dear Judge Chesler:

Please be advised that our office represents defendants, Toyota Motor Sales, U.S.A., Inc. ("TMS"), Toyota Motor Engineering & Manufacturing North America, Inc. ("TEMA"), Toyota Motor North America, Inc. ("TMA") and Toyota Motor Credit Corporation ("TMCC"), in the above referenced matter. Please accept this correspondence as a request, pursuant to L.Civ.R. 6.1, for a 14-day extension of time for defendants to respond to plaintiff's Complaint.

On March 29, 2011, plaintiff served defendants, TMS, TMA and TMCC, with a copy of the Complaint. On April 1, 2011, plaintiff served defendant, TEMA, with a copy of the Complaint. Defendants subsequently removed this matter to this Court on April 28, 2011. Defendants have not obtained any prior extensions to respond to the pleadings in this matter.

As Your Honor may be aware, Toyota has sought inclusion of this action in *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2151, which is currently pending in the Central District of California. The Judicial Panel on Multidistrict Litigation's (JPML's) ruling will, in all likelihood, result in the transfer of this action. Defendants seek this extension to permit the parties to reach an appropriate agreement concerning the inclusion of this matter in the MDL, and application of the MDL deadlines.

In light of the above, defendants respectfully request that this Court provide defendants 14 days within which to file a response to plaintiff's Complaint.

**ECKERT  
SEAMANS**

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Thank you once again for Your Honor's consideration of this matter. Please contact me with any questions.

Respectfully submitted,



DENNIS P. ZIEMBA

DPZ/mz

cc: Robin Willner, Esquire

So Ordered this 5th day  
of May, 2011

